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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ADEL HASSAN HAMAD,

Petitioner,

v.

GEORGE W. BUSH, DONALD
RUMSFELD, JAY HOOD, and BRICE
GYURISKO,

Respondents.

CV 05-1009 JDB

PETITIONER'S SUPPLEMENT TO
EMERGENCY MOTION FOR
ACCESS TO CLIENT

In support of the Petitioner's Motion to Compel Access to Client (CR 11), scheduled for mediation conference on Tuesday, Feb. 7, 2006, before Magistrate Judge Alan Kay, counsel for Mr. Hamad submit an e-mail dated February 2, 2006, from Terri McPalmer, CDR, JAGC, U.S. Navy, and its attached instructions.

The email provides notice from the Office for the Administrative Review of the Detention of Enemy Combatants of the opportunity for counsel to provide input regarding

Petitioner for review and consideration by the 2006 Administrative Review Boards (ARBs), in assessing whether to continue to detain Mr. Hamad. The notice establishes a deadline of February 24, 2006, for submission of all relevant information not previously considered by the ARB. According to the Counsel Submission Fact Sheet attached to the e-mail, information received after the Petitioner's 2006 ARB has been conducted "will be retained for consideration at your client's next annual review if he remains in detention."

This communication reinforces the importance of Petitioner's request for expedited issuance of the security clearances that the government has required as a condition precedent to access both to Mr. Hamad himself at the Guantánamo Naval Base and to information about Mr. Hamad that may be classified. Without access to Mr. Hamad or to information considered by the Combatant Status Review Tribunal or previous ARB, counsel will have no way to know what misapprehensions the ARB may be operating under with respect to the need for continued detention of Mr. Hamad.

Respectfully submitted February 3, 2006.

/s/ Steven T. Wax
Steven T. Wax
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/s/ Patrick J. Ehlers
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